

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA**

**AARON LARRY BOWMAN**

**NO. 3:20-01372**

**VERSUS**

**JUDGE DOUGHTY**

**OUACHITA PARISH SHERIFF'S OFFICE,  
ET AL**

**MAG. JUDGE HAYES**

**RULE 12(b)(6) MOTION TO DISMISS  
BASED ON PRESCRIPTION**

**NOW INTO COURT**, through undersigned counsel, comes Ouachita Parish Sheriff Jay Russell, and his Deputy Sheriff, Donovan Ginn (the “Ouachita Sheriff Defendants”), who, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, do hereby move for dismissal of the Complaint on the ground that it fails to state a cause of action against them upon which relief may be granted because the claims the plaintiff attempts to bring herein have prescribed and are time-barred. For the reasons more fully set forth in the accompanying memorandum, this Motion should be granted and all of the claims made against the Ouachita Sheriff Defendants in the Complaint under federal and state law should be dismissed, with prejudice, and at the sole cost of the Plaintiff.

Respectfully Submitted,

**USRY & WEEKS, PLC**

/s Craig E. Frosch

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